



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626**

Ref: 8MO

June 2, 2009

Mr. Paul Bradford, Supervisor,
Kootenai National Forest
1101 U.S. Highway 2 West
Libby, Montana 59923

Re: CEQ # 20090153; EPA Comments on Grizzly
Vegetation and Transportation Management Project
FEIS and ROD

Dear Mr. Bradford:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision for the Grizzly Vegetation and Transportation Management Project in accordance with our responsibilities under the Section 102(2)(C) of National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to agency DEIS comments that were included in the FEIS. While EPA supported selection of Alternative 3 over Alternative 2, modifications made to Alternative 2 in the FEIS/ROD (Alternative 2A), appear to result in reduced adverse environmental effects in comparison to DEIS Alternative 2 (e.g., 400 acre reduction in grapple piling slash treatment; reducing harvest an increasing riparian protection along Burnt Dutch #472 Road; increasing grizzly bear core habitat by 2,700 acres; dropping units 57 and 57a near the Roderick IRA; winter harvest on units 1, 2, 3, 4, 11, 17, and 32 to minimize soils impacts; and redesigning certain units to maintain wildlife movement corridors). These changes reduce our concerns regarding Alternative 2A, although we still consider Alternative 3 to be environmentally preferred.

We very much support the watershed rehabilitation work included in the Grizzly Vegetation and Transportation Management project (i.e., 15.4 miles of road decommissioning; 9.7 miles of road storage; 36 miles of road BMP improvements, 27 miles of passive road decommissioning - abandonment). We are pleased that the FEIS states that the funding for watershed rehabilitation work, while still uncertain, is likely (page 8). Roads are stated to be the single largest source of management related sediment in most streams in the Yaak River Basin. Reduction in sediment delivery from the road system to surface waters will be critical to restoring and maintaining aquatic health in the area. We also note that reduction in road density is often associated with improved wildlife habitat and security, including grizzly bear habitat and security, and reduced risks of human caused fires.

We also want to state that we are pleased that four stream monitoring sites were established in 2003 during the Yaak TMDL project, and that the Kootenai NF is seeking funding to establish a PIBO monitoring site on Burnt Creek in 2009. It is important to determine the actual effects of management actions through monitoring.

The EPA appreciates the opportunity to review and comment during the EIS process. If you have any questions please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at potts.stephen@epa.gov. Thank you for your consideration.

Sincerely,

John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Connie Collins, EPA 8EPR-N, Denver
Mike Herrin, District Ranger, Troy